



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

May 8, 2008

Ms. Lori Parnass
Project Manager
Department of Toxic Substances Control
Site Mitigation and Cleanup Operations Branch
9211 Oakdale Avenue
Chatsworth, CA 91311

RE: Draft Remedial Investigation Report Omega Chemical Superfund Site Operable
Unit 2, January 2008

Dear Ms. Parnass:

Thank you for your comments dated March 24, 2008 regarding the subject document. The comments were received by EPA on April 1, 2008. The purpose of this letter is to provide written responses to the comments for your consideration. The comments and corresponding responses are summarized in a table prepared by CH2M Hill attached to this letter. CH2M HILL also consulted with USGS personnel regarding the comments, which were separated into paragraphs, as appropriate, to better address separate issues raised within a given comment. The responses provide specific recommendations on revisions to the report to address the comments.

After you have reviewed the responses, we would welcome the opportunity to meet with you and discuss them. EPA concurs with several of the comments and will incorporate those into the revised OU-2 RI Report. Others may be more applicable to the Feasibility Study process and will be further evaluated during that process. However, some of the comments may reflect a misunderstanding of the information presented in the subject document.

For example, the differences in the stratigraphic interpretation by DTSC and CH2M HILL appear to have resulted from a different understanding of the term "site." The scope of the investigation was Omega Operable Unit 2 (OU2), while many of the comments seem to refer to the former Omega Chemical property. The scope of the

investigation and terminology are explained in Section 1.1.1 of the draft report. Please see the responses to Comments 1 and 2 in the attached table.

The majority of the comments regarding hydrogeology and stratigraphy appear to have resulted from the assumption that the Regional Hydrogeology (Section 4.5.1) is the Site Hydrogeology (Section 4.5.2). Section 4.5.1 presents an overview of the hydrogeology of the basin based on literature review, while the interpretation of the site hydrogeology based on the investigation results is presented in Section 4.5.2. The report will be revised to make this distinction more clear.

The comments also refer to the Repetto Hills for what we understand to be the Puente Hills. It appears that this could be a naming convention issue. CH2M Hill used the naming conventions consistent with those used in the Department of Water Resources (DWR) Bulletin 104.

The comments on the Omega model primarily address the assignment of the boundaries and volumetric budget. The model volumetric budget (attached) will be added to the report; the budget should help resolve the comments regarding the model. The text will also be revised to avoid any misunderstanding of the model boundaries.

Thank you again for your comments and DTSC's continued support regarding the Omega site. After you have reviewed the attached responses, please call me at (415) 972-3149 regarding possible meeting dates.

Sincerely,

Chris Lichens
Superfund Project Manager

cc: Glenn Bruck, EPA
Alice Campbell, DTSC
Tom Perina, CH2M Hill